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Attorneys for Defendants
 WSP USA, INC., WSP USA BUILDINGS, INC., and
 kW MISSION CRITICAL ENGINEERING, D.P.C.

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

CG ENTERPRISES HOLDINGS, LLC, a
 California limited liability company; and
 STEPHEN M. COON, an individual;

Plaintiff,

vs.

WSP USA, INC., a New York corporation;
 WSP USA BUILDINGS, INC., a New York
 corporation; kW MISSION CRITICAL
 ENGINEERING, D.P.C., a New York design
 professional corporation; and DOES 1
 through 20, inclusive,

Defendants.

) Case No. 3:24-cv-00292-VC

) [Removed from Sonoma County Superior Court
 Case No.: 24CV00024]

) **DEFENDANTS' MOTION TO DISMISS**
) **PURSUANT TO FEDERAL RULES OF**
) **CIVIL PROCEDURE 12(B)(2), (3), AND (6)**
) **OR, IN THE ALTERNATIVE, TO STAY**
) **THIS ACTION PURSUANT TO 9 U.S.C. §**
) **3, OR TRANSFER PURSUANT TO 28**
) **U.S.C. § 1404(a)**

) [Fed. R. Civ. P. 12(b); Civ.L.R. 7]

) Hearing Date: March 14, 2024
) Hearing Time: 10:00 a.m.
) Location: 450 Golden Gate Avenue,
) Courtroom 4, 17th Floor,
) San Francisco, CA 94102

PLEASE TAKE NOTICE THAT in accordance with this Court’s February 8, 2024 Order (ECF No. 27), Defendants WSP USA, INC., WSP USA BUILDINGS, INC., and kW MISSION CRITICAL ENGINEERING, D.P.C. (“Defendants”) hereby re-move the above-captioned Court, located at 450 Golden Gate Avenue, Courtroom 4, 17th Floor, San Francisco, California 94102, for an order dismiss all claims alleged against them in the Complaint filed by Plaintiffs Stephen Coon and CG Enterprise Holdings, LLC, or in the alternative, staying this Action or transferring it. This Motion is based on this Notice of Motion and Motion, the previously-filed Notice of Motion and Motion (ECF No. 24), Memorandum of Points and Authorities (*Id.*), Declaration of Kenneth Clausen in Support Thereof (ECF No. 24-1), the Proposed Order Thereupon (ECF No. 24-2), any papers filed in Reply, argument of counsel, the Court’s file, and any and all other matters the Court deems appropriate and proper.

Dated: February 13, 2024

HOLLAND & KNIGHT LLP

/s/ Samuel J. Stone

Samuel J. Stone

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INC., and kW MISSION CRITICAL
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